

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
MIDLAND/ODESSA DIVISION**

DANIELLE SPEARS,

Plaintiff,

VS.

NEXT BRIDGE HYDROCARBONS, INC.,
GREGORY MCCABE, JOHN BRDA,
SECURITIES & EXCHANGE
COMMISSION, FINANCIAL INDUSTRY
REGULATORY AUTHORITY, JANE DOE
1-20, JOHN DO 1-20,

Defendants.

[illegible]

Case No. 7:24-CV-321-DC-RCG

**DEFENDANT MCCABE’S OPPOSED MOTION
TO EXTEND PLEADING DEADLINE**

Defendant Gregory McCabe files this opposed motion seeking an extension of his deadline to answer or otherwise respond to Plaintiff's Second Amended Complaint (Doc. 13) and respectfully shows the Court as follows:

1. Mr. McCabe’s deadline to respond to Plaintiff’s Second Amended Complaint is May 12, 2025. (Doc. 21). The Second Amended Complaint spans 88 pages and 254 paragraphs, names dozens of defendants, and purports to allege at least 9 causes of action. (Doc. 13).

2. After appearing in this case, Mr. McCabe retained the undersigned counsel, who also represents Defendant John Brda. Mr. Brda's responsive pleading deadline is June 16, 2025. (Doc. 19).

3. Good cause for this extension is made because it would align the responsive pleading deadlines for two defendants and streamline the issues to be presented to the Court.

4. The Court previously granted an opposed extension under similar circumstances and found the requested extension to be “reasonable.” *Pease v. SEC, et al.*, No. 7:24-cv-322, Doc. 16 (W.D. Tex. May 26, 2025).

5. Accordingly, Mr. McCabe respectfully requests that the Court extend his deadline to answer or otherwise respond to Plaintiff’s Second Amended Complaint to June 16, 2025.

6. This is Mr. McCabe’s second request for an extension of time.

7. This extension is not sought for purposes of delay, but so that justice may be done.

8. Undersigned counsel conferred with *pro se* Plaintiff; Plaintiff indicated she is opposed to the requested extension.

[signature page follows]

Dated: April 30, 2025.

Respectfully submitted,

/s/ Jason S. Lewis

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ATTORNEYS FOR DEFENDANT

GREGORY MCCABE

CERTIFICATE OF CONFERENCE

Pursuant to the Local Civil Rule CV-7(G), the undersigned hereby certifies that, as counsel for Defendant McCabe, he conferred with Plaintiff Danielle Spears via telephone on April 29, 2025. Plaintiff has indicated that she is opposed to the relief requested by this motion.

/s/ Ryan D. Lantry
Ryan D. Lantry

CERTIFICATE OF SERVICE

I certify that I served the foregoing document on all counsel of record via the Court's CM/ECF system on April 30, 2025.

/s/ Jason S. Lewis
Jason S. Lewis